



February 22, 2013

Helder Gil
Legislative Specialist
Department of Consumer and Regulatory Affairs
1100 Fourth Street SW, Room 5164
Washington, DC 20024

Dear Mr. Gil:

This letter is our second response to the Notice of Proposed Rulemaking to replace Title 12 (D.C. Construction Codes Supplement) of the District of Columbia Municipal Regulations was published in the *D.C. Register* on December 7, 2012, at 59 DCR 14179-14768. DC Water is submitting these additional attached comments for your consideration.

If you have questions regarding our comments or would like to discuss any of them in detail feel free to call me at 202-787-2081.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Pickering', with a stylized flourish at the end.

William Pickering
Government Relations Manager, District of Columbia Water and Sewer Authority

Cc: constructioncodes@dc.gov



COMMENTS ON 12 DCMR

1. *Insert additional text at the end of Section 101.4.4.3 Scope to read as follows:*

“Water and drainage connections to such installations shall be made in accordance with the requirements of the *Plumbing Code* “and DC Water Standards, Specifications and Details”.

2. *Insert additional text at the end of Section 102.1 General to read as follows:*

“Systems shall also include the building service connections in both the public and private space”.

3. *Insert additional text at the end of Section 105.1.7.1(Raze Permits) Other Requirements as follows:*

“Prior to issuing a raze release, water and sewer service connections must be abandoned at the main and in accordance with DC Water Standards, Specifications and Details.”.

4. *Insert a new paragraph under Section 105.2 Work Exempted from Permit, subsection Plumbing to read as follows:*

“4. Repair and replacement of water and sewer mains and building services performed by DC Water”.

5. *Amend Section 105.2.3 Public Service Agencies to read as follows:*

“ A permit shall not be required under the *Construction Codes* for the installation alteration or repair of equipment “**and facilities**” used for the generation, transmission, distribution, metering, or treatment that is under the ownership or control of public service agencies subject to the jurisdiction of the Public Service Commission or DC Water.

6. *Amend section under Section 105.3.10.1 Exemptions under section 105.3.10 Design Professional in Responsible Charge to allow minor plumbing service connection plans to be prepared by a registered plumber as follows:*

“4. Preparation of drawings or details for the installation of water and sewer building connections to a single family residential structure may be prepared by a registered plumber.”

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7. *Amend Section 106.1.10.1 Public Sewer, Strike the third sentence and insert new to read as follows:*

“A Water and Sewer Availability Certificate (WSAC) issued by DC Water, shall be provided with the plumbing plans for every project entailing new water or sewer service connections or where the sewer or water demand has increased due to new fixture counts or mechanical demands. “

8. *Amend Section 106.1.10.2 Public Water Main by inserting additional text at the end of the section to read as follows:*

“A Water and Sewer Availability Certificate (WSAC) issued by DC Water, shall be provided with the plumbing plans for every project entailing new water or sewer service connections or where the sewer or water demand has increased due to new fixture counts or mechanical demands. “

9. *Strike Section 106.6.6 Covenants for Water or Sewer Utility Service and insert new section 106.6.6 to read as follows:*

“Covenants for Water or Sewer Utility Service. A covenant running with the land shall be required before a permit shall be issued to install water or sewer utility services to a lot from an adjacent lot or to extend such services to a lot or *premise* from a building, as approved pursuant to Section 301.3.1 of the *Plumbing Code*. The covenant shall ensure that joint utility use to each property will be maintained and that access to operate and repair the joint utility is provided to the jointly used service connections. Covenants to construct, own, operate and maintain the water and sewer service connections may be required in order to permit non-conforming utility service connections in public space.

10. *Strike Section 111.1 Connection of Service Utilities and insert new Section 111.1 to read as follows:*

111.1 Connection of Service Utilities. No person shall make connections from a utility source of energy, fuel, power or **water or sewerage** to any building other structure or other system that is regulated by the *Construction Codes* for which a permit is required, until the permit is issued by the code official.

COMMENTS ON 12 DCMR SUBTITLE F PLUMBING CODE SUPPLEMENT

11. *Strike Section 715.1 of the International Plumbing Code and insert new section in the Plumbing Code in its place to read as follows:*

715.1 Sewage Backflow. In existing structures where plumbing fixtures have been installed on a floor with a finished floor elevation below the elevation of the manhole cover of the next

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upstream manhole in the public sewer; such fixtures shall be protected by a backwater valve installed in the building drain or horizontal branch serving such fixture. Plumbing fixtures installed on a floor with a finished floor elevation above the elevation of the manhole cover of the next upstream manhole in the public space shall not discharge through a backwater valve.

715.1.2 Exemptions. Where the *Code Official* deems it appropriate for protection of multi-level single family dwellings in flood prone areas, an exemption may be granted to install backwater valves in the building drain servicing the entire premise and allow fixtures on a floor with a finished elevation above the adjacent manhole in public space to discharge thru the backwater valve.

715.1.1 Prohibited Discharge thru a Backwater Valve. For all new construction or alterations and repairs whose cost exceeds 50% of the value of the structure, plumbing fixtures whose flood rim elevation is below that of the adjacent public sewer shall not discharge through a backwater valve. Plumbing fixtures meeting these criteria shall discharge to a sump pump or ejector in conformance with the requirements of Section 712. Battery backup systems will be required on such systems.

COMMENTS ON 12 DCMR SUBTITLE F PLUMBING CODE SUPPLEMENT

12. *Strike Section P3008 of the International Residential Code and insert new section in the Plumbing Code in its place to read as follows:*

P3008.1 General. In existing structures where plumbing fixtures have been installed on a floor with a finished floor elevation below the elevation of the manhole cover of the next upstream manhole in the public sewer; such fixtures shall be protected by a backwater valve installed in the building drain or horizontal branch serving such fixture. Plumbing fixtures installed on a floor with a finished floor elevation above the elevation of the manhole cover of the next upstream manhole in the public space shall not discharge through a backwater valve.

P308.2 Exemptions. Where the *code official* deems it appropriate for protection of Multi-level single family dwellings in flood prone areas an exemption may be granted to install backwater valves in the building drain servicing the entire premise and allow fixtures on a floor with a finished elevation above the adjacent manhole in public space to discharge thru the backwater valve.

P308.3 Prohibited Discharge thru a Backwater Valve. For all new construction or alterations and repairs whose cost exceeds 50% of the value of the structure, plumbing fixtures whose flood rim elevation is below that of the adjacent public sewer shall not discharge through a backwater valve. Plumbing fixtures meeting these criteria shall discharge to a sump pump or ejector in conformance with the requirements of section P3007.1 Battery backup systems will be required on such systems.

P308.4 Construction. Backwater valves shall have noncorrosive bearings, seats and self-aligning discs, and shall be constructed to ensure a positive mechanical seal. Valve Access covers shall be water tight.